

EXHIBIT W

Hill, Brian

From: Rachel Weiser <rachelmayweiser@gmail.com>
Sent: Monday, May 06, 2013 5:21 AM
To: Hill, Brian
Cc: Rochon, Mark; Hibey, Richard; Dina Rovner; M Haller; Robert Tolchin
Subject: Re: Guetta Document Production
Attachments: Photo Lineup Pics.zip

Brian --

Attached are the photos as they were received by us. There are no "communications" regarding when and how we obtained them, and even if we had such communications they are both irrelevant and protected as work-product. I also do not see how any such communications would be responsive to any of your requests to Varda Guetta.

Thank you.

--Rachel

On Sun, May 5, 2013 at 2:46 PM, Hill, Brian <BHill@milchev.com> wrote:

Rachel,

This document production is obviously incomplete.

The document containing photographs which you produced has obviously been altered to add letters to the original document(s) from which the photos came.

You must produce the original document(s) from which these photographs were obtained as well the communications relating to when and how the Plaintiffs obtained those original document(s).

We need to receive the original documents and the communications about how Plaintiffs obtained them immediately in order to be able to make use of them at Ms. Guetta's deposition on Tuesday.

Please let me know whether and when you will produce these materials.

Regards,

Brian A. Hill
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Washington, DC 20005-5701
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From: Rachel Weiser [mailto:rachelmayweiser@gmail.com]
Sent: Friday, May 03, 2013 8:58 AM
To: Hill, Brian
Cc: Rochon, Mark; Hibey, Richard; Dina Rovner; M Haller; Robert Tolchin
Subject: Guetta Document Production

Brian --

Attached please find Varda Guetta's objections and responses to the document request contained within her notice of deposition.

Thank you.

--Rachel





























